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January 3, 2013

BY FACSIMILE [212-805-7900]

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Hasanoff,
S7 10 Cr. 162(KMW)

Dear Judge Wood:

This letter is submitted in regard to an adjournment of the sentencing and sentencing submission dates in the above-entitled case, in which David A. Ruhnke, Esq., Linda Moreno, Esq., and I represent defendant Sabirhan Hasanoff. Mr. Hasanoff's sentencing is currently scheduled for January 17, 2013, at 10:00 a.m., and his sentencing submission is due today. I was notified yesterday by the Assistant United States Attorneys assigned to this case that the government is in the process of declassifying material that will, if declassified, be material to our sentencing submission, and which requires us to wait until after this material is declassified to prepare Mr. Hasanoff's sentencing letter. Also, depending on precisely what the government declassifies, we may need to go back to the Secure Compartmentalized Information Facility to compose a classified filing, in order to put the declassified material in context. In light of these considerations, and the scheduling conflicts discussed below, it is respectfully requested that Mr. Hasanoff's sentencing be adjourned until mid-to-late March, at a date and time convenient to the Court, with sentencing submissions to be filed in late February. The government does not object to this request.

In addition to the reasons stated above, Mr. Ruhnke and I also have scheduling conflicts that necessitate an adjournment of the sentencing date in this case. I am set to appear as standby

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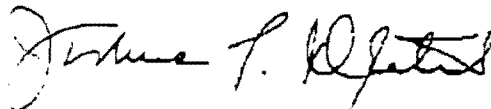
Hon. Kimba M. Wood
United States District Judge
Southern District of New York
January 3, 2013
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counsel for a trial commencing January 16, 2013, before the Honorable Sidney H. Stein, in *United States v. Mondher Bejaoui*, 10 Cr. 553. I was hoping to resolve the case prior to trial and therefore did not expect that there would be a conflict with Mr. Hasanoff's sentencing, but with the trial date fast approaching, in fact the trial will go forward on the scheduled date. Mr. Ruhnke is scheduled to begin the jury selection process in a capital case in Puerto Rico, *United States v. Alexis Cadelario-Santana*, 09 Cr. 427 (JAF), next week. His commitment in that case both hinders his ability to address the declassified materials and to attend Mr. Hasanoff's sentencing on its current date.

Accordingly, it is respectfully requested that this Court adjourn Mr. Hasanoff's sentencing until mid to late March, at a date and time convenient to the Court, with sentencing submissions to be filed in late February. As set forth above, the government does not object to this request.

Sentencing is adjourned to
March 25, 2013, at 10:30 a.m.
Defendants' submission is due
February 25, 2013. Government
response is due March 4, 2013.

Respectfully submitted,

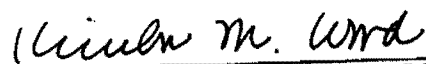


Joshua L. Dratel

JLD/lal

cc: AUSA John Cronan (by e-mail)
AUSA Aimee Hector (by e-mail)

1-7-13
SO ORDERED: N.Y., N.Y.



KIMBA M. WOOD
U.S.D.J.